

Sept. 4, 2013

The Hon. Joe Haveman
Michigan House of Representatives
State Capitol
Box 30014
Lansing, MI 48909-7514

Dear Representative Haveman:

We are writing to express our concern about Senate Bill 374 (presently before the House Appropriations Committee) and the anonymous state hot-line program it would enable under the Attorney General's office.

We regret that we did not learn of the existence of SB 374 until too late in that chamber's consideration to coordinate an effective response to it. That being said, one of our organizations was able to get written comments to members of the Senate Education Committee only shortly before Senate bill passage. That same organization had previously, without knowing about SB 374, expressed written concerns to the Attorney General's office regarding this program.

The Attorney General's proposal accompanied by SB 374 would establish a statewide hotline to be staffed by state police personnel. Callers could anonymously contact the hotline to report students (up through the high school level) whom callers believe capable of "potential harm or criminal acts directed at school students, school employees, or schools in this state." (Such language, lacking reference to the possibility of self-harm, is one of several indications that the proposed program will yield criminalization, as opposed to human service assistance, for some very troubled individuals.)

State police personnel receiving the contacts would decide whether the case in question requires referral to and further investigation by law enforcement and/or the student's school.

Among several concerns we have (a number of which were previously communicated to the Attorney General's office) are:

~With all the state and national behavioral hotlines already existing (e.g., every Community Mental Health program in Michigan has to operate a 24-7 emergency line), why is there a need for a new hotline? Do the perceived benefits merit the estimated monetary cost and potential detrimental effects?

~Are the state police the most appropriate repository for fielding contacts in this new program? Would a different state department (e.g., Community Health) be preferable?

~As we know from research literature that acts of mass violence are perpetrated by persons with severe mental disorder in about half of all cases, should the hotline dispatchers be mental health professionals?

~SB 374 specifies no manner of training that hotline dispatchers would receive. ("Appropriate training" of state personnel is referenced once without amplification.)

~The bill specifies no criteria for hotline dispatchers to use in deciding whether to refer a case to law enforcement or schools.

~There is no specification of training or criteria on next steps for schools receiving a referral.

~Dealing with at-risk individuals often requires effective linkage to human service assistance (most especially mental health for a program of this manner), yet there is nothing in the bill or other material we've received from the Attorney General that specifically covers this.

~The bill does not clearly or properly address records confidentiality. At minimum, if a person has been reported and there is no subsequent corroboration of that person fitting section (3)(1) of the bill, the individual's name should be expunged from the records of all administrative entities participating in the project.

~The annual reporting requirements in the bill contain nothing on human service assistance provided and its outcomes (another indicator of ignoring the need to match troubled individuals with appropriate assistance).

~Material from the program on which the Attorney General proposal is modeled ("Safe2Tell," Colorado) seems heavily oriented toward legal outcomes of cases as opposed to whether and what level of human service assistance was provided.

~SB 374 would allow some or all of the project to be contracted. Might it be premature for a program in such infancy to be bid out in its entirety, especially given the bill's requirement for a memorandum of understanding between the Attorney General and the state police?

~A program such as that proposed would benefit from an advisory committee that includes (but is not limited to) mental health service consumers, families, and advocates.

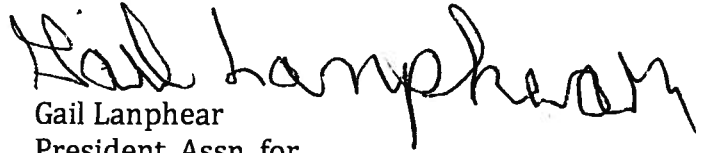
We believe SB 374 requires ample time for revisions and improvements to the Attorney General's concept and proposal regarding this project. We respectfully request that the House Appropriations Committee and the full House grant that time and express the desire for a better program and bill.

Thank you for your thoughtful consideration of our views. Our organizations would be pleased to discuss them further with you.

Sincerely,



Elmer Cerano
Exec. Dir., Michigan
Protection & Advocacy



Gail Lanphear
President, Assn. for
Children's Mental Health



Susan McParland, Exec. Dir.
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